

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

**Bryndon Fisher, Bruce Reid, and Erick
Shipmon, derivatively on behalf of Federal
National Mortgage Association,**

Plaintiffs,
v.

The United States of America

Defendant,
and **Federal National Mortgage Association**
Nominal Defendant.

No. 1:13-cv-00608-MMS

**PLAINTIFFS' UNOPPOSED MOTION FOR ENLARGEMENT OF TIME TO
FILE SECOND AMENDED CONSOLIDATED DERIVATIVE COMPLAINT**

Pursuant to RCFC 6(b)(1)(A), Plaintiffs Bryndon Fisher, Bruce Reid, and Erick Shipmon (“Plaintiffs”), by their undersigned counsel, respectfully move the Court for an order giving Plaintiffs an additional two weeks, until March 8, 2018, to file their Second Amended Consolidated Derivative Complaint.

Under the current schedule (Dkt. No. 33), Plaintiffs’ Second Amended Consolidated Derivative Complaint is due February 22, 2018; Defendant’s omnibus motion to dismiss is due June 22, 2018; Plaintiffs’ response to Defendant’s omnibus motion to dismiss is due September 20, 2018; and Defendant’s reply in support of its omnibus motion to dismiss is due December 19, 2018.

Due to scheduling issues, Plaintiffs respectfully request a two-week extension, until March 8, 2018, to file their Amended Complaint. Plaintiffs further request that the deadline for Defendant’s omnibus motion to dismiss be extended to June 29, 2018. All other deadlines shall remain the same.

Plaintiffs have not previously sought an extension of time related to their Second Amended Consolidated Derivative Complaint. Plaintiffs have conferred with counsel for the Government, and the Government does not oppose Plaintiffs' Motion.

Respectfully submitted,

DATED: February 21, 2018

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